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November 13, 2002

Mr. Frank L. Amoroso
Nixon Peabody, LLP
990 Stewart Avenue
Garden City, NY 11530

Dear Mr. Amoroso:

Re: Northrop Grumman, October 2002 Site-Specific Work Plan
for the Town of Oyster Bay, Bethpage Community Park Delineation
Sampling Program

First of all, thank-you for your timely submission of the referenced sampling work plan for the Bethpage Community Park. Northrop Grumman's willingness to move forward on this delineation is appreciated. However, we are concerned that the proposed plan will not provide an adequate understanding of site contaminants that can serve as the basis for an evaluation of remedial alternatives. We have enclosed specific comments from Department staff that outline our concerns. Comments from our chemists regarding the Quality Assurance program and from NYSDOH are still being prepared. We will have these available for you when we meet.

In order to resolve these issues, we propose to schedule a meeting before the end of the month to discuss and develop a more acceptable workplan. Please call me with potential meeting dates that would be suitable for you and your technical staff.

Sincerely,

Stephen Hamilton
Hazardous Waste Compliance Counselor

Enclosure



NYSDEC Review of the
Northrop Grumman, October 2002
Site-Specific Work Plan for the Town of Oyster Bay
Bethpage Community Park
Delineation Sampling Program

November 13, 2002

1. The objectives of the study need to be better defined so that everyone understands what the study is expected to accomplish.

- Identify the limits of contamination above levels of concern.
- Define the areas of highest contamination.
- Provide adequate information to evaluate various remedial options.
- Determine if contamination at the park is currently causing groundwater contamination.

2. The workplan should contain additional graphics that show the extent of the waste as we currently know it and how that relates to the proposed sampling plan.

- The location and depth of all contaminants known to exceed TAGM levels.
- Air photos showing areas of prior disposal with an overlay of the sampling grid and current park features.

3. The 100 foot sampling grid must be completed to define the overall horizontal extent of the waste. Areas of concern include:

- East of the ballfield (one additional site.)
- West of ballfield (move two proposed sites and add three sites.)
- Garden islands on entrance road (two sites.)
- Recharge basin - surface samples only (two sites.)

4. Horizontal delineation must define the end of contamination down to 1 ppm for PCBs and appropriate levels for other contaminants.

- The default assumption has to be that waste extends up to the first clean boring. Because of this, the large distance between proposed sample site, B-8 and the samples it is attempting to delineate is not adequate to meet the putative study goals.
- The plan must include a discussion of when/how the investigation will be extended if contamination is found in new samples.
- In areas where contamination is seen up to property lines or up to paved areas, delineation needs to be continued until the end is reached even if this extends offsite. This may include the access road, residential properties and the old plant 24 parking area.